

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI**

|                           |   |                             |
|---------------------------|---|-----------------------------|
| UNITED STATES OF AMERICA, | ) |                             |
| PLAINTIF,                 | ) |                             |
|                           | ) |                             |
| VS.                       | ) | Cause No: 4:17-cr-00356 RWS |
|                           | ) |                             |
| PAUL CREAGER,             | ) |                             |
| DEFENDANT.                | ) |                             |

**MOTION TO MODIFY THE TERMS AND CONDITIONS OF DEFENDANT’S  
PRETRIAL RELEASE**

Comes now Kenneth Leeds, attorney for Defendant, and moves that the terms and conditions of Defendant’s Pre-Trial Release be modified in the following respects:

**EMPLOYMENT**

One of the terms and conditions of Defendant’s Conditions of Release is that he “continue to seek employment” For most of his working life Defendant has been self-employed in the commercial and residential construction field. Defendant would like to continue to work in this capacity but he has received push back from Pretrial Services. As this motion is being prepared Defendant has several opportunities to obtain work but Pretrial Services has informed Defendant that he cannot do so without its prior approval. If Defendant is required to notify Pretrial Services every time he submits a contract to a potential customer; Defendant runs the risk of losing the contract because Pretrial Services has advised Defendant it could take up to seven days before approval is granted; in the meantime Defendant would be at a competitive disadvantage to other contractors in obtaining the contract.

Defendant proposes that he be allowed to work for himself, without employees, and that he notify Pretrial Services every time he is hired to perform construction services. This way

Defendant will be able to continue to earn a living while at the same time Pretrial Services will be kept informed of all of Defendant's work activities. In addition, Defendant suggests that he be ordered to maintain a log of potential employment contacts so that he can inform Pretrial Services of his attempts to gain work.

**TRAVEL RESTRICTED TO THE EASTERN DISTRICT OF MISSOURI**

Defendant's company owns a house in Lake of the Ozarks that is on the market. The net proceeds from the sale of the house will be deposited with the Court or placed in Defendant's attorney's trust account until this cause is resolved. In order to get the house sold, Defendant needs to travel back and forth between St. Louis County and Camden County where the house is located. It is Defendant's understanding that it takes at least 48 hours for Pretrial Services to approve a travel request. There may be times when Defendant has to travel to the house at a moment's notice if the listing agent calls him with a prospective buyer. Additionally, Defendant needs to go back and forth from the house in order to maintain it until it is sold. Defendant suggests that he advise Pretrial Services immediately if he plans to travel to Camden County in order to secure the sale of the property or maintain it.

Wherefore, Defendant prays that this court enter its order permitting Defendant to work in accordance with the terms of his request stated herein and that Defendant be permitted to travel back and forth to the Ozark property without having to obtain pre travel approval from Pretrial Services.

/s/Kenneth Leeds #30885  
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**CERTIFICATE OF SERVICE**

Comes now Kenneth Leeds and certifies that a copy of the foregoing was filed with the court's electronic filing system this 14<sup>th</sup> day of August 2017.

/s/Kenneth Leeds